

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:) Chapter 11
)
W.R. GRACE & CO., *et al.*,) Case No. 01-01139 (JKF)
) Jointly Administered
)
Debtors.)
) Related to Docket Nos. 15719
) Objection Deadline: June 14, 2007 @ 4:00 p.m.
) Hearing Date: June 21, 2007 @ 8:30 a.m.
)

MOTION FOR PROTECTIVE ORDER

COMES NOW, Motley Rice LLC, (hereinafter “Motley Rice”) a law firm representing various asbestos personal injury claimants, and hereby files this Motion for a Protective Order in response to a Notice of Deposition it received from W.R. Grace & Co.’s (hereinafter “Grace”). In support of its Motion for a Protective Order, Motley Rice states as follows:

1. Grace sent a Notice of Deposition to Motley Rice on or about May 18, 2007 (Docket No. 15719) Exhibit “A”, as referenced in the Memorandum in Support of Motley Rice’s Motion for a Protective Order filed contemporaneously with this document.
2. Motley Rice has not been served with a subpoena by Grace.
3. Grace’s Notice is procedurally defective, seeks information both privileged and beyond the scope of discovery, is unreasonably burdensome, expensive, and inconvenient, and is otherwise improper.
4. A more thorough discussion of the grounds on which Motley Rice is contained in the Memorandum in Support of Motley Rice’s Motion for a Protective Order and

Exhibits which has been filed contemporaneously with this Motion and is incorporated herein by reference.

5. Motley Rice further adopts and incorporates by reference the rationale enunciated in other similarly situated plaintiff law firms' Motion for Protective Orders and supporting documentation to the extent such are consistent with Motley Rice's position.
6. A Proposed Order granting Motley Rice's Motion for a Protective Order is attached hereto.

WHEREFORE, for the reasons stated herein, in the Memorandum in Support of Motley Rice's Motion for Protective Order and Exhibits, and the Motions for Protective Orders and supporting documents filed by other plaintiffs' law firms similarly situated, Motley Rice prays that this Court enter a Protective Order that precludes the Deposition of Motley Rice LLC for any reason whatsoever in this case and that this Court grant Motley Rice LLC such other just, necessary, and further relief that this Court deems proper.

Dated: June 4, 2007.

RESPECTFULLY SUBMITTED,

/s/ John E. Herrick
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